

THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA

CASE NUMBER: 24 CR 81

v.

DONALD BENNETT and EDWARD BINERT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Count One

On or about February 14, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section Offense Description

Title 18, United States Code, Section 2113(a)

By intimidation, took from the person and presence of bank employees money belonging to, and in the care, custody, control, management, and possession of Chase Bank at 9540 Roberts Rd, Hickory Hills, Illinois 60457, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

Count Two

On or about February 14, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section Offense Description

Title 18, United States Code, Section 924(c)(1)(A)

Use, carry, and brandish a firearm during and in relation to a crime of violence for which they each may be prosecuted in a court of the United States, namely, bank robbery in violation of Title 18, United States Code, Section 2113(a), as charged in Count One of this complaint.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

CASSANDRA JOHNSON

Special Agent,

Federal Bureau of Investigation (FBI)

	is presented by reliable electronic means. The above- to the truth of the Complaint and Affidavit by telephone.
Date: February 15, 2024	Judge's signature
City and state: Chicago, Illinois	KERI L. HOLLEB HOTALING, U.S. Magistrate Judge Printed name and title

AFFIDAVIT

- I, Cassandra Johnson, being duly sworn, state as follows:
- 1. I am a Special Agent with the Federal Bureau of Investigation. I have been so employed since approximately March 2020.
- 2. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to violent crimes, including, among others, kidnaping, bank robbery, and the apprehension of violent fugitives.
- 3. This affidavit is submitted in support of a criminal complaint alleging that DONALD BENNETT and EDWARD BINERT have violated Title 18, United States Code, Sections 2113(a) and 924(c)(1)(A)(ii). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging BENNETT and BINERT with bank robbery by intimidation and brandishing a firearm in furtherance of a crime of violence, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offenses alleged in the complaint.
- 4. This affidavit is based on my personal knowledge derived from my own investigation, observations, and actions; information provided to me by other law enforcement agents, as well as by persons with knowledge of the offense; my review

of surveillance photographs and other evidence; my own training and experience as an FBI Special Agent; and the experience and training of other agents.

FACTS SUPPORTING PROBABLE CAUSE

A. Investigative Background

- 5. The FBI is investigating a series of armed bank robberies which occurred in between June 2023 and early 2024 in the suburbs of Chicago, Illinois. Specifically, the FBI is investigating seven robberies that occurred at either a Chase Bank or a Fifth Third Bank on or about June 27, 2023 (Oak Lawn, Illinois), August 25, 2023 (Oak Lawn, Illinois), November 1, 2023 (Lombard, Illinois), November 29, 2023 (Willowbrook, Illinois), December 1, 2023 (Tinley Park, Illinois), January 26, 2024 (Glen Ellyn, Illinois) and February 14, 2024 (Hickory Hills, Illinois). Based on my personal involvement in this investigation, including my review of police reports and other evidence, I know that six of the seven bank robberies have the following similarities: the robber was a single older white male wearing a face covering, who brandished a handgun; the robber demanded bank funds from a teller; and a rental vehicle was used as the getaway vehicle.
- 6. The seventh robbery on February 14, 2024 was committed by two white males. One male wore a dark colored fake wig and black face covering, and the other wore a dark colored fake wig and fake beard. The robber with the black face covering brandished a firearm during the robbery. As with the first six robberies, the robbers used a rental vehicle as the getaway vehicle in the February 14, 2024 robbery.

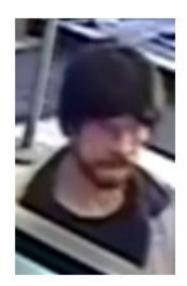
7. The facts related to three of the seven robberies are set forth below: June 27, 2023 (Oak Lawn), August 25, 2023 (Oak Lawn), and February 14, 2024 (Hickory Hills).

B. June 27, 2023, Robbery of Chase Bank in Oak Lawn, Illinois

- 8. The robbery occurred on June 27, 2023, at approximately 2:30 p.m. at the Chase Bank, located at 5705 West 95th Street, in Oak Lawn, According to bank records, the robber fled the bank on foot with \$11,400 in United States Currency ("USC") from the 95th Street Bank.
- 9. According to Victim A who was interviewed immediately following the robbery, Subject 1 appeared to be wearing a wig and fake beard. Victim A heard Subject 1 say something to the effect of, "this is not a game" and "I need all of the money out of the drawers."
- 10. According to Witness A, Subject 1 directed the tellers not to touch any of the buttons. According to Witness A, Subject 1 was wearing a wig and a fake beard of the same color.
- 11. Bank-security footage from the Chase Bank corroborates statements regarding the robber wearing a wig, which appears to be dark brown/black in color and of a bowl-cut style, covering the majority of Subject 1's forehead, eyebrows, and ears. Bank security footage also shows the robber used a blue cloth/canvass-style tote bag.







C. August 25, 2023, Robbery of Chase Bank in Oak Lawn, Illinois

- 12. The robbery occurred on August 25, 2023, at approximately 12:17 p.m. at the Chase Bank, located 10440 South Cicero Avenue, in Oak Lawn, Illinois (approximately 2.5 miles from the Chase Bank robbery on June 27, 2023).
- 13. According to Victim tellers, Subject 2 approached victim tellers, placed a cloth bag on the counter, and demanded money from the teller drawers. Subject 2 subsequently pointed a suspected firearm at the tellers, stole approximately \$30,868 and fled in a red Nissan.
- 14. According to Witness B who was interviewed immediately following the robbery, Subject 2 appeared to be wearing a brown wig underneath a hat and a surgical mask. Witness B heard Subject 2 instruct the tellers not to push any buttons and to put the money in the bag. Witnesses indicated Subject 2 left the bank once the money was placed in the bag. Witness C noted that Subject 2 entered the front passenger door of a red Nissan sedan prior to fleeing the scene, which as shown below,

Witness C photographed and provided to the Oak Lawn Police Department. Victim B also observed the red vehicle in close proximity to the bank.

15. Security footage was obtained from the bank's interior, as the bank does not have any exterior cameras. Video footage corroborates statements regarding witnesses' observations of Subject 2, depicting a white male in a surgical mask, an army green or tan baseball cap, and what appears to be a black/dark-colored wig underneath the hat holding a cloth bag. A small, suspected firearm can also be observed from the footage in Suspect 2's right hand. Due to the lack of exterior cameras on the bank, no further footage was obtained of the red Nissan sedan.





Robber at teller station with gun

Robber entering front passenger of Nissan

16. Oak Lawn Police Department obtained the photo of a red Nissan sedan with chrome above the license plate from Witness D. In this photo, Subject 2 is seen opening the front passenger side door of the vehicle immediately after the robbery, suggesting the presence of an accomplice acting as a getaway driver. Oak Lawn Police officers searched license plate readers in the area around the time of the robbery for

a vehicle matching the witnesses' description, and located a red Nissan with license plate BW 11535. However, the license plate was registered to a gray Chevrolet Cruze owned by Individual $\rm B.^1$

- 17. Additional license plate reader hits were located, identifying the red Nissan Altima with Illinois tag BW 11535 travelling in the vicinity of the Chase Bank just shortly before and after the robbery. The vehicle bearing tag BW 11535 was observed driving southbound on Cicero Avenue at 95th Street (the direction of the bank) at 12:09 p.m., shortly before the robbery, and northbound on Cicero Avenue at 97th Street (away from the bank in the direction of the Kilpatrick address) at 12:22 p.m., shortly after the robbery.
- 18. Illinois State Police utilized additional law enforcement databases to query vehicles matching the description of the red Nissan in the area of the bank around the time of the robbery, and identified a red Nissan at the intersection of Cicero Avenue and 97th Street in Oak Lawn at 10:43 a.m. on August 25, 2023, approximately an hour and a half before the robbery occurred. The license plate was observed to be Illinois plate FP 205801.
- 19. Illinois plate FP205801 was queried in additional databases by agents, which indicated it is registered to Rent-A-Wreck, a rental company, located at 5225 West 79th Street, Burbank, Illinois. Agents went to the rental facility and observed

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¹ Individual B resides in Greenup, Illinois. Individual B informed law enforcement that Individual B sold the Chevrolet Cruze nearly two years ago to an individual through Facebook and he/she believes the plate was removed before the sale. A search of license plate readers from the Chicagoland area around the date of the robbery, or weeks after, shows license plate BW 11535 associated with the red Nissan and a Honda Odyssey

the red Nissan Altima with Illinois Tag FP 205801. Although no physical evidence was located in the vehicle, unique characteristics of the vehicle were noted. Specifically, the front rims of the vehicle were observed to be chrome with center caps, while the rear passenger rim is silver, without a center cap. This discrepancy is apparent in the license plate reader shots of the red Nissan Altima with the plate BW 11535 which were taken just before and after the robbery, consistent with law enforcement's current suspicion, based on information developed in the investigation to date, that the plates had been swapped out, suggesting this is the same vehicle and the plates had been swapped out.

20. The rental car facility uses GPS to track their vehicles and Geolocations are recorded every time the ignition is turned on and off. On or about August 25, 2023, at approximately 12:04 p.m., the ignition on the Red Nissan with Illinois Tag FP 205801 was turned on in the vicinity of 9078 Kilpatrick Avenue, Oak Lawn, Illinois. The ignition was then turned off at approximately 12:28 p.m. in the vicinity of 9068 Kilpatrick Avenue, Oak Lawn, Illinois. The area of 9068 and 9078 of Kilpatrick Avenue is approximately two miles (seven driving minutes) from Chase Bank. The vehicle was turned back on at approximately 12:58 p.m. in the vicinity of 9047 Kilpatrick Avenue, Hometown, Illinois, and turned off at approximately 01:10 p.m. in the area of 7931 South Latrobe Avenue, Burbank, Illinois, 250 feet from the rental facility. Per the rental facility, the vehicle was returned at approximately 1:13 p.m., less than an hour after the August 25 bank robbery which occurred at approximately 1:17 p.m.

- 21. Agents received information from the rental facility that the Red Nissan with Illinois Tag FP 205801 was rented by Donald Ray BENNETT. BENNETT provided his Kentucky driver's license to the rental car facility, with his home address listed as 102 Summit Drive, Campbellsville, Kentucky 42718. BENNETT also provided the following phone number to the rental company, 708-297-7204. Agents confirmed through law enforcement databases that this number is associated with BENNETT. BENNETT's criminal history was run by FBI's intelligence analyst, which indicates numerous previous arrests for bank robbery utilizing a weapon. BENNETT was previously convicted of bank robbery and assault with a deadly weapon in Kentucky in 1967 and sentenced to 24 years' imprisonment. In 1989, BENNETT was also convicted of a bank robbery in the Chicagoland area.
- 22. The rental car facility provided law enforcement with security camera footage, in which an individual is shown matching BENNETT's description, as seen in his driver's license photo, as well as the descriptions provided by victims and witnesses immediately following the robbery. Footage from the exterior of the rental facility also shows BENNETT entering a black Ford Escape after he returned the rental red Nissan Altima. Footage indicates the Ford Escape was waiting on the street near the rental facility and shows another white male in the passenger seat as it again drove past the rental facility.





Bennett inside the rental company

Bennett entering driver's side of Ford Escape



Unknown individual in front passenger's seat of Ford Escape

23. Surveillance was conducted around the area of 9068-9078 Kilpatrick Avenue, Oak Lawn, Illinois, based on the Geolocation records obtained from the rental facility, which the vehicle appeared to return to multiple times. Agents located a black Ford Escape bearing Kentucky license plate 145HGM in this vicinity. A query of the license plate indicated it was registered to BENNETT and the address of 102 Summit Drive, Campbellsville, Kentucky.

24. Oak Lawn PD conducted a traffic stop of the Ford Escape on August 25, 2023, at approximately 8:45 p.m. According to Oak Lawn police officers, the driver was positively identified as BENNETT. BENNETT advised he was in Illinois visiting family and friends and planned to return to his home state of Kentucky on or about August 26, 2023. During the traffic stop, Oak Lawn obtained consent to search the vehicle from BENNETT and located an army green/tan ballcap, consistent with that observed in the bank security footage.





Hat in Ford Escape

Hat robber wore on August 25, 2023

25. The rental facility provided additional documentation from previous times in which BENNETT rented vehicles from them. BENNETT rented a vehicle from the facility on June 27, 2023, from approximately 7:00 a.m. and returned the vehicle at approximately 7:00 a.m. on June 28, 2023, consistent with the June 27, 2023 bank robbery timeframe. Geolocation records from this rental period indicate the vehicle's ignition was on at 12:32 p.m. and turned off at 2:37 p.m. around the vicinity of 9068 Kilpatrick Avenue, Oak Lawn. Google Maps indicates 9068 Kilpatrick

Avenue, Oak Lawn, is approximately 1.8 miles, six driving minutes, away from the Chase Bank, located at 5705 W. 95th Street, Oak Lawn.

D. February 14, 2024 Robbery of Chase Bank in Hickory Hills, Illinois

- 26. According to my review of surveillance footage provided by Chase Bank, on February 14, 2024, at approximately 11:54 a.m., an unknown male individual (Robber 1) entered Chase Bank located at 9540 Roberts Rd, Hickory Hills, Illinois 60457. Robber 1 appears to be Caucasian, wearing a two toned grey and dark colored jacket, with blue jeans and dark colored shoes. At approximately 11:56 a.m., Robber 1 entered the behind teller counter after the door was unlocked by a bank employee (Victim 1).
- 27. According to my review of bank surveillance footage, while Robber 1 was in the bank, a second unknown male (Robber 2) waited in the front door vestibule by the ATM. At approximately 11:55 a.m., Robber 2 brandished a silver handgun to a woman (Victim Customer 1) at the ATM located in the vestibule. Victim Customer 1 entered the bank followed by Robber 2. As Robber 2 entered the bank, he brandished the silver handgun. Robber 2 pointed the handgun at customers and employees. The customers and employees are seen moving to a cubicle. Robber 2 moved quickly through the bank, continuing to brandish the silver handgun. According to my review of the surveillance footage, Robber 2 appears to be Caucasian with dark hair, wearing a dark colored jacket, dark pants, dark shoes, and a black facemask.





Robber 1

Robber 2 with firearm in hand

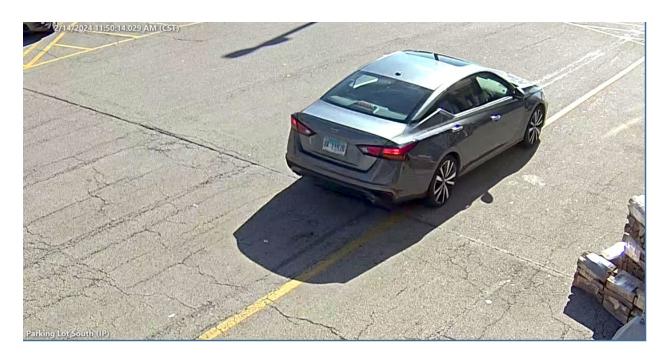
- 28. At approximately 11:56 a.m., Robber 1 and Robber 2 leave the bank. According to my review of the surveillance video, Robber 1 was carrying a black canvas bag with writing on the side.
- 66. Law enforcement reviewed surveillance video captured by a business located near the bank at the time of the bank robbery on February 14, 2024. According to the surveillance video, the two robbers exited the bank and entered a silver sedan (Subject Vehicle 1) at approximately 11:56 a.m. Subject Vehicle 1 then flees the bank parking lot. More surveillance footage was obtained from other businesses surrounding the bank.
- 67. Prior to the robbery, at approximately 11:50 a.m., surveillance video footage depicts Subject Vehicle 1 driving in front of a grocery store and a white male with a beard wearing a two toned jacket can be seen in the front passenger seat.



68. The passenger resembled Robber 1 that entered the bank at approximately 11:54 a.m. as pictured below.



69. Surveillance video from the grocery store shows Subject Vehicle 1 to be a newer model silver Nissan Altima with an Illinois license plate. Several digits of the license plate can be read including the middle digits to be "115".



70. A search of Automated License Plate Readers (ALPR) in the area revealed Subject Vehicle 1 at 8th St and 49th Ave in Oak Lawn, IL at approximately 12:11 p.m. Google maps shows the intersection to be approximately 11 minutes from the bank robbery. Subject Vehicle 1 was bearing Illinois License Plate BW11535. Law enforcement identified the plate as returning to a silver Chevy and not Subject Vehicle 1. As discussed above, a vehicle bearing Illinois License Plate BW11535 was used on a vehicle used in a similar Chase bank robbery in Oak Lawn on August 25, 2023.



71. According to vehicle rental records, BENNETT rented a newer model Silver Altima bearing a Pennsylvania License Plate: MFM 3621 from AVIS at approximately 7:30 a.m. on February 14, 2024. Law enforcement viewed surveillance footage at the AVIS rental and confirmed that the subject who rented the vehicle matched the description of BENNETT. Below is a surveillance photo of the vehicle, prior to BENNETT renting it, from February 9, 2024. The vehicle is identical to the Subject Vehicle 1.



72. According to records provided by AT&T, the rented Nissan bearing Pennsylvania license plate MFM3621 has an IMSI of 310170225248288. According to records from AT&T, the historical cell site location information for the vehicle are consistent with the vehicle being in the area of the bank at the time of the robbery.

E. Identification of the Subject Premises

- 73. According to information obtained from Enterprise Holdings Inc., BENNETT rented a Toyota Camry bearing Illinois license plate F3T713 from their rental location at Midway Airport from October 30, 2023 through November 1, 2023. According to information obtained from Enterprise Holdings Inc., BENNETT rented a black Chevrolet Equinox bearing Illinois license plate FP183238 from their rental location in Alsip, Illinois from November 29, 2023 through December 2, 2023.
- 74. According to these rental agreements, the primary phone number on the rental was 708-297-7204 which is attributed to BENNETT according to law enforcement databases. According to information obtained from Enterprise, employees

have to visually compare the driver's license photo of the individual who picks up the rental vehicle to the individual who arrives in person.

- 75. The secondary phone number on both rental agreements was 708-682-7407, which is attributed to EDWARD BINERT, according to law enforcement databases. According to Enterprise, the account profile containing the phone number 708-682-7047 belongs to customer BINERT at 9001 S. Cicero Avenue in Oak Lawn, Illinois, which is the address of the trailer park where the Subject Premises is located, with email address edwardbinert@gmail.com. According to Enterprise records, there is another account profile for Individual A connected to the same email and address listed above.
- 76. According to information obtained from AT&T, the cellular device using phone number 708-682-7407, attributed to BINERT, was in the vicinity of the June 2023 Oak Lawn Chase Bank robbery, the Lombard Chase Bank robbery, the Willowbrook Chase Bank robbery, and the Tinley Park Fifth Third Bank robbery.

F. Locating BENNETT and BINERT after the February 14, 2024 Robbery

77. According to surveillance in the vicinity of the Subject Premises conducted on February 14, 2024, Subject Vehicle 2 was parked outside of the Subject Premises at approximately 11:55 a.m. According to law enforcement databases, the vehicle is registered to Swope Hyundai located in Elizabethtown, Kentucky. Law enforcement contacted Swope Hyundai to determine if the vehicle had been sold and who it had been sold to. Law enforcement confirmed the vehicle was sold to man named

DONALD BENNETT from Campbellsville, Kentucky. According to BENNETT's driver's license, his address is 102 Summit Avenue, Campbellsville, Kentucky.

78. According to surveillance, at approximately 2:40 p.m., two white males and one white female came from the direction of the Subject Premises entered Subject Vehicle 2. Subject Vehicle 2 drove to a restaurant located at 9500 Southwest Highway, Oak Lawn, Illinois. The three individuals exited Subject Vehicle 2 and sat down at a booth inside the restaurant. According to surveillance, the two men were identified as DONALD BENNETT and EDWARD BINERT, based on surveillance officers' familiarity with their appearances based on officers' review of known driver's license photographs of BENNET and BINERT. The woman was not identified. BENNETT was observed to be wearing the same hat he was seen wearing during the August 25, 2023 Oak Lawn Chase Bank robbery that was also sitting on his passenger seat when he was stopped by law enforcement later that day.

G. FBI Arrest of BENNETT and BINERT

- 79. On February 14, 2024, at approximately 11:58 p.m., law enforcement executed search warrants for the Subject Premises, Subject Vehicle 1, and Subject Vehicle 2. I was present at the Subject Premises when the warrants were executed.
- 80. Based on my own observations and information received from other law enforcement officers involved in the execution of the warrants, BENNETT, BINERT, and a female later identified as Individual A were located within the Subject Premises at the time the search warrant was executed.

- 81. Law enforcement searched the Subject Premises and recovered the following items which are believed to be used by BENNETT and BINERT during the February 14, 2024 robbery of the Chase Bank in Hickory Hills, Illinois:
 - a. A brown wig, two sets of Illinois license plate BW 11535,² a gray hat with hair attached, and makeup were recovered in a backpack in the bedroom closet;
 - b. A loaded silver firearm was recovered on a couch immediately to the right of the entrance and a loaded black firearm was recovered tucked in between a seat cushion and the armrest of the different couch;
 - c. A loaded multi-color firearm was recovered from a bedside table in the bedroom;
 - d. A stack of shrink wrapped U.S. Currency (pending count), a black canvass tote bag, and a pistol magazine were recovered in a blue suitcase in the living room;
 - e. Approximately \$188 U.S. Currency recovered in BENNETT's wallet;
 - f. Two black jackets matching the those worn by the robbers during the February 14, 2024 bank robbery, a pair of black shoes, and a paper towel with what appeared to be makeup smudged on it were recovered from a garbage bag in the kitchen.

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² As discussed above, vehicles with Illinois license plate BW 11535 were used during the August 25, 2023 and February 14, 2024 bank robberies.



Brown wig recovered in bedroom closet



Stolen license plates recovered in bedroom closet

- 82. Law enforcement searched Subject Vehicle 1 and recovered a black surgical mask and dark beanie hat.
- 83. Law enforcement searched the Subject Vehicle 2 and recovered a navy jacket with a gray hood, a gray baseball cap, and documents showing BENNETT's ownership of Subject Vehicle 2.
 - 84. Law enforcement arrested BENNETT and BINERT.

H. EDWARD BINERT Post-Arrest Interview

85. After I advised BINERT of his *Miranda* rights, BINERT participated in a video-recorded interview. During my interview of BINERT, he stated that he robbed the Chase Bank located in Hickory Hills, Illinois on February 14, 2024. BINERT identified himself as the robber who was wearing a green jacket and black pants

(Robber 1). BINERT stated that they used the silver sedan parked outside the Subject Premises, which was a rental car from AVIS or another company (Subject Vehicle 1). According to BINERT, the vehicle was rented by DONALD BENNETT, who uses the nickname "Doc." BINERT stated that he met BENNETT in approximately 2006 while they were both serving time in a federal penitentiary in Michigan. BENNETT lived in Kentucky and had been staying with BINERT for a visit since the Sunday prior.

86. BINERT stated that, during the robbery, the silver sedan (Subject Vehicle 1) was parked near the bank while BINERT and another individual robbed the bank. According to BINERT, he rallied up all the employees, told them it was a robbery, and asked them to stay put. BINERT stated that he brought his silver and black 9mm pistol into the bank. BINERT stated the gun was his. BINERT stated the pistol was currently located on the black leather couch in the living room of the Subject Premises. BINERT did not know how much money they received from the bank and stated it was already gone.

I. Information Received from Chase Bank

87. According to Chase Bank representatives, an audit conducted on or about February 14, 2024, confirmed that the robbers took approximately \$6,963.75 from the bank. Further, the bank representatives confirmed that at the time of the February 14, 2024, robbery, Chase Bank's deposits were insured by the Federal Deposit Insurance Corporation ("FDIC"). Law enforcement has also obtained a copy of Chase Bank's FDIC certificate, which confirms that Chase Bank was FDIC insured on February 14, 2024, the date of the robbery.

CONCLUSION

88. Based on the foregoing facts, I respectfully submit that there is probable

cause to believe that, on or about February 14, 2024, DONALD BENNETT and

EDWARD BINERT by intimidation, took from the person and presence of bank

employees money belonging to, and in the care, custody, control, management, and

possession of Chase Bank, located at 9540 Roberts Rd, Hickory Hills, Illinois 60457,

the deposits of which were then insured by the Federal Deposit Insurance

Corporation, in violation of Title 18, United States Code, Section 2113(a) and used,

carried, and brandished a firearm during and in relation to a crime of violence for

which they each may be prosecuted in a court of the United States, namely, bank

robbery, as charged in Count One of this complaint, in violation of Title 18, United

States Code, Section 924(c)(1)(A).

FURTHER AFFIANT SAYETH NOT.

CASSANDRA JOHNSON

Special Agent,

Federal Bureau of Investigation (FBI)

SWORN TO AND AFFIRMED by telephone February 15, 2024.

Honorable KERI L. HOLLEB HOTALING

United States Magistrate Judge